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March 18, 2021

**BY ECF**

Honorable Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1050  
New York, New York 10007

So ordered,  
/s/ Alvin K. Hellerstein  
Alvin K. Hellerstein  
3/19/21

Re: Colette Smith v. MetroPlus Health Plan, et al.  
Civil Action No.: 20-cv-10570 (AKH)

Dear Judge Hellerstein:

I am the Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, assigned to represent defendants MetroPlus Health Plan and New York City Health and Hospitals Corporation (collectively, “Defendants”)<sup>1</sup> in the above-referenced action. I write to respectfully request a two-week extension of time, from March 22, 2021 to April 5, 2021, for Defendants to respond to the complaint. Plaintiff’s counsel consents to this request. There are no other dates previously scheduled after the original date.

Defendants previously requested, and the Court granted, a 45-day extension of time, from January 14, 2021 to March 1, 2021, and a three-week extension of time, from March 1, 2021 to March 22, 2021, to submit Defendants’ response to the complaint. This additional extension request is made due to the undersigned’s very heavy caseload, which includes preparation for several upcoming depositions and a hearing before the New York State Division of Human Rights, and necessitates additional time to prepare and finalize Defendants’ response to the Complaint.

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<sup>1</sup> Upon information and belief, the individual defendant, Teresa Taylor, has not yet been served.

Thank you for your consideration of this matter.

Respectfully Submitted,

/s/

Laura C. Williams  
Assistant Corporation Counsel

cc: Corey Stark, Esq. (by ECF)  
Corey Stark PLLC  
*Attorney for Plaintiff*